IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ICONTROL NETWORKS, INC., a Delaware corporation, Plaintiff, v. ZONOFF INC., a Delaware corporation, Defendant.	C.A. No. 14-1199-GMS

SUPPLEMENTAL JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to Paragraph 2 of the parties' January 7, 2016 stipulation [D.I. 74], Plaintiff Icontrol Networks, Inc. ("Icontrol") and Defendant Zonoff Inc. ("Zonoff") jointly submit this Supplemental Joint Claim Construction Statement which includes, as Exhibit 1, the additional disputed terms that either party contends is in need of construction, the parties' respective positions on construing each such additional disputed term, and citations to intrinsic evidence for each such additional disputed term. It further includes, as Exhibit 2, additional agreed constructions for certain claim terms.

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/s/ Mary B. Matterer
Richard K. Herrmann, Esquire (I.D. No. 405)
Mary B. Matterer, Esquire (I.D. No. 2696)
MORRIS JAMES LLP
500 Delaware Avenue, Suite 1500
Wilmington, Delaware 19801
302.888.6800
rherrmann@morrisjames.com
mmatterer@morrisjames.com

Attorneys for Plaintiff
Icontrol Networks, Inc.

/s/ Jody Barillare
Colm F. Connolly, Esquire (I.D. No. 3151)
Jody Barillare (I.D. No. 5107)
MORGAN, LEWIS & BOCKIUS LLP
The Nemours Building
1007 North Orange Street, Suite 501
Wilmington, Delaware 19801
302.574.7290
cconnolly@morganlewis.com
jbarillare@morganlewis.com

Attorney for Defendant
Zonoff Inc.

EXHIBIT 1 – SUPPLEMENTAL DISPUTED CLAIM TERMS

"logic that sends via the remote network a request to a gateway registry . . ., receives an address of a gateway server . . ., sends to the gateway server the identification of the account, and manages the set of local management devices . . . ." - '871 Patent	
Icontrol's Position	**Zonoff's Position**
This is a means-plus-function term Structure: Logic 816; Col. 8 Li. 45-56 Function: Plain and Ordinary Meaning Intrinsic evidence: Figures 1-6 and 8; Col. 2 Li. 14 – 36; Col. 2 Li 56 – Col. 3 Li. 39; Col. 3 Li. 48 – 54; Col. 3 Li. 55 – Col. 4 Li. 10; Col. 4 Li. 11 – 29; Col. 4 Li. 34 – 53; Col. 5 Li. 35 – 56; Col. 5 Li. 57 – Col. 6 Li. 12; Col. 6 Li. 13 – 35; Col. 6 Li. 54 – Col. 7 Li. 17; Col. 7 Li. 18 – 31; Col. 7 Li. 32 – 41; Col. 7 Li. 42 – 50; Col. 8 Li. 14 – 44; Col. 8 Li. 45 – 56; Col. 8 Li. 64 – 67; Col. 15 Li. 4 – 40; Col. 15 Li. 57 – 62; and Col. 15 Li. 63 – Col. 16 Li. 3	This is a means-plus-function term This term is not capable of construction

EXHIBIT 2 – SUPPLEMENTAL CLAIM TERMS WITH AGREED CONSTRUCTIONS

"identification of a zone function" - '211 Patent
identification of the behavior of the zone